

COASTAL CONSERVANCY

Staff Recommendation

May 27, 2010

**SAN DIEGUITO RIVER PARK TRAILS
PHASE II TRAIL DESIGN AND CONSTRUCTION**

File No. 05-031-02

Project Manager: Christopher Kroll

RECOMMENDED ACTION: Authorization to disburse up to \$317,000 to the San Dieguito River Park Joint Powers Authority to: 1) construct a trail segment of the Coast to Crest Trail; 2) construct the Mesa Loop Trail and 3) develop alternative alignments and complete engineering design, environmental review and construction documents for the Reach the Beach segment of the Coast to Crest Trail.

LOCATION: San Dieguito River Valley, cities of Del Mar and San Diego, San Diego County

PROGRAM CATEGORY: Public Access

EXHIBITS

Exhibit 1: [Project Location Map](#)

Exhibit 2: [San Dieguito River Park Map](#)

Exhibit 3: [Trails Map](#)

Exhibit 4: [Reach the Beach Trail Alternatives](#)

Exhibit 5: [May 18, 2005 Staff Recommendation](#)

Exhibit 6: [Project Letters](#)

Exhibit 7: Environmental Impact Report/Statement (*Separate CD*)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31400 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed three hundred seventeen thousand dollars (\$317,000) to the San Dieguito River Park Joint Powers Authority (the JPA) for planning and construction related to the Coast to Crest Trail and construction of the Mesa Loop Trail, subject to the following condition:

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Prior to commencement of the project, the JPA shall submit for the review and written approval of the Conservancy's Executive Officer the following:

- a) Evidence that the JPA has obtained all necessary permits and approvals and has conducted all necessary environmental review.
- b) A signing plan for the project acknowledging Conservancy participation.
- c) A final work plan (including the names of any contractors to be used in the completion of the project), and a project schedule and budget.
- d) An agreement between the JPA and the City of San Diego sufficient to allow the Mesa Loop Trail to be built, operated for public access and maintained for a period of no less than twenty years."

Staff further recommends that the Conservancy adopt the following findings:

"Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with the current Project Selection Criteria and Guidelines.
2. The proposed authorization is consistent with the purposes and objectives of Chapter 9 of Division 21 of the Public Resources Code, regarding coastal access.
3. The Coastal Conservancy has independently reviewed the sections of the San Dieguito Wetland Restoration Project Environmental Impact Report/Environmental Impact Statement relevant to segment 8 of the Coast to Crest Trail and the Mesa Loop Trail and finds that there is no substantial evidence that these aspects of the proposed project, as mitigated, will have a significant effect on the environment.
4. The proposed project will serve greater than local needs."

PROJECT SUMMARY:

Staff recommends that the Conservancy provide a grant of up to \$317,000 to the San Dieguito River Park Joint Powers Authority (the JPA) for trail design and construction of segments of the Coast to Crest Trail and the Mesa Loop Trail adjacent to San Dieguito Lagoon in the cities of Del Mar and San Diego. The trails are located within the San Dieguito River Park, a regional river parkway extending 55 miles from Volcan Mountain along the San Dieguito River to the Pacific Ocean in Del Mar (Exhibit 2).

Once completed, the Coast to Crest Trail will be one of San Diego County's major regional trails linking inland communities to the ocean. The trail has been divided into segments and is being constructed over time segment by segment as money becomes available. Of the 55 miles of the trail, 28 have already been constructed.

The JPA has requested funding to: 1) construct segment 8 of the Lagoon Trail portion of the Coast to Crest Trail; 2) construct the Mesa Loop Trail; and 3) develop alternative alignments and complete engineering design, environmental review and construction documents for a preferred alternative for the Reach the Beach segment of the Coast to Crest Trail (Exhibit 3).

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The Lagoon Trail is the portion of the Coast to Crest Trail located adjacent to San Dieguito Lagoon. The 2.7-mile Lagoon Trail has been divided into 9 segments. Funding for construction of segments 1-7 came from a Federal Transportation Enhancement Activities (TEA) grant and a 2005 grant from the Coastal Conservancy (Exhibit 3). Construction of these segments has been completed. The 2005 Conservancy grant was intended to help fund completion of segments 1-9 but the JPA was not able to construct all nine segments with the available funding. The JPA has recently obtained a \$349,670 State Environmental Enhancement Mitigation Grant to construct the ½ mile long Segment 9 across the Del Mar Horse Park. Part of those funds will be used to reconfigure the horse show rings to enable the trail to be constructed through the site. The JPA is now requesting that the Conservancy provide additional funding for the construction of segment 8 which will link the future Nature Center to Del Mar Horse Park. Segment 8 is approximately 2300 linear feet in length.

The Mesa Loop Trail is a 1.7-mile trail that will be located on a high mesa overlooking the newly restored lagoon. The trail will be designated a “wildlife viewing area” and will have interpretive signs. The trail is not part of the Coast to Crest Trail, nor is it required as part of the Southern California Edison mitigation project described below. The JPA is planning to construct a 25-car parking lot to serve visitors to the Mesa Loop Trail, but construction of that parking lot is not part of the project proposed for this grant.

The Reach the Beach segment of the Coast to Crest Trail will extend approximately 1.39 miles from Jimmy Durante Boulevard to the beach at the mouth of the San Dieguito River (Exhibit 4). Alignment of this section of the trail has not been resolved as the trail must cross over or around the Del Mar Fairgrounds property (owned by the 22nd District Agricultural Association), Jimmy Durante Boulevard, Highway 101, railroad tracks, and a sensitive wetland area near the mouth of the river. This segment of the Coast to Crest Trail is very important because it will connect the trail with both the future Coastal Trail alignment and the beach. But due to the difficulties in identifying the best alignment of this segment, the JPA has requested funding for an alternatives analysis to identify a preferred alignment. The JPA has also requested funding for design and environmental analysis (CEQA) of the preferred alignment, which was not analyzed in the San Dieguito Wetland Restoration Project EIR/EIS.

The San Dieguito River Park Joint Powers Authority is a local government agency established in 1989 by San Diego County and the cities of Del Mar, Solana Beach, Escondido, Poway, and San Diego. The JPA acquires natural open space, restores habitat and provides recreation and educational interpretation in the San Dieguito River Park. The JPA currently owns and manages 1,200 acres of natural open space and 22 miles of multi-use trails in the San Dieguito River Valley and has initiated and implemented a number of construction and restoration projects in the park.

Site Description: San Dieguito Lagoon has the largest watershed area (350 square miles) of the six San Diego County coastal lagoons. For decades, the floodplain was used for agriculture. Beginning in the early 20th century developments such as the Del Mar Fairgrounds, Interstate 5, and the railroad began filling in the floodplain, reducing the estuarine open water and wetlands from 600 acres to about 200 acres. Both Interstate 5 and the railroad travel north/south cutting across the inlet channel. As more proposed development threatened to fill in the remaining floodplain and surrounding hillsides, local citizens began a grassroots effort to preserve and protect the lagoon, floodplain and surrounding undeveloped slopes. This effort led to the creation

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of the San Dieguito River Park Joint Powers Authority. Today most of the coastal floodplain is in public ownership.

An \$83 million wetland restoration project is currently underway at the lagoon. The project began in 2006 and is being funded by Southern California Edison (SCE) as mitigation for fish impacts caused by the San Onofre Nuclear Generating Station. Over 150 acres of new tidal marshes and mudflats are being created and other areas restored on both sides of I-5. Most of these areas were previously farmland. Over the past two years SCE's contractor has dredged new tidal channels and water basins to form new wetlands.

The mixture of salt water from the ocean and fresh water from the San Dieguito River upstream creates an important breeding and food environment for fish and bird populations. Shallow water habitat that is currently being expanded by the restoration project provides habitat for over 19 fish species. San Dieguito Lagoon supports hundreds of bird species (both permanent residents and winter visitors) including many that are threatened or endangered such as the Belding's savannah sparrow, western snowy plover, and the light-footed clapper rail found in the riparian area just outside of the project area. The lagoon restoration will also include seven new nesting sites for the endangered California least tern. Construction of the restoration project will be completed in 2009 although the area will undergo several more years of monitoring and maintenance before it reaches full maturity. Newly formed wetlands that are now open to tidal flushing are already supporting many fish species.

Project History: The Coastal Conservancy has been involved with efforts to preserve and restore the San Dieguito Lagoon and River since 1979 when the Conservancy participated with the City of Del Mar in the completion of the "San Dieguito Lagoon Resource Enhancement Program," which outlined projects west of I-5 including the restoration of a 70-acre tidal basin dredged by the California Department of Fish and Game in 1983. In 1989, the City of Del Mar developed the "Conceptual Plan for the Expanded San Dieguito Lagoon Resource Enhancement Program," which proposed restoring the lagoon system to its historic extent east of I-5 with neighboring uplands.

The JPA was formed in 1989 by the County of San Diego and the Cities of Del Mar, Escondido, Poway, San Diego and Solana Beach for the purpose of creating a greenway and natural open space park system in the San Dieguito River Valley. In 1994, the JPA adopted a Concept Plan for the 55-mile San Dieguito River Park. (The JPA adopted a revised and updated Concept Plan in 2002.) In 2000, the JPA completed the "Park Master Plan for the Coastal Area of the San Dieguito River Valley Regional Open Space Park" (Master Plan) with partial funding from the Coastal Conservancy.

In 1992, the California Coastal Commission directed Southern California Edison to create 150 acres of wetlands at the San Dieguito Lagoon. This wetland restoration plan was augmented with funds secured in 1990 from the Coastal Conservancy, U.S. Fish and Wildlife Service and JPA to plan transitional, upland and freshwater habitat. This work culminated in the San Dieguito Wetland Restoration Project for the restoration of wetlands and associated uplands from El Camino Real to the Pacific Ocean which was approved by the San Dieguito River Park JPA Board of Directors in September 2000. The restoration project began construction in 2006.

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At its meeting on May 27, 2004, the Coastal Conservancy granted funds to the JPA to purchase the 73.4-acre Boudreau property located on the eastern end of the wetland restoration area. The Boudreau property represented a critical west-east link between other publicly owned river corridor parcels along the 55-mile San Dieguito River Park and its purchase allowed the JPA to secure almost the entire coastal area from El Camino Real to the Pacific Ocean in public ownership.

At its May 18, 2005 meeting, the Conservancy approved a grant to the JPA for the construction of segments 1-9 of the Lagoon Trail portion of the Coast to Crest Trail as match for a federal Transportation Enhancement Activities (TEA) grant (Exhibit 5). Construction of segments 1-7 was completed in early 2009.

PROJECT FINANCING

Coastal Conservancy	\$ 317,000
Total Project Cost	\$ 317,000

The expected source for the Conservancy funds for this project is an appropriation to the Conservancy in fiscal year 2007-08 from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84). Proposition 84 authorizes the use of bond funds for projects that promote access to and enjoyment of coastal resources. Public Resources Code 75060. This funding source may be used for the protection of San Diego Bay and adjacent watersheds. Public Resources Code 75060(f) states that the term "San Diego Bay and adjacent watersheds" includes "the coastal and bay watersheds within San Diego County." Proposition 84 defines the term "protection" to include actions necessary to allow continued use and enjoyment of natural resources, including development. Public Resources Code Section 75003.5(m). The San Dieguito River watershed is a coastal watershed in San Diego County. The proposed project will create additional public trails along the San Dieguito River. Consistent with the purposes of this funding source, the proposed project would be funded by the Coastal Conservancy pursuant to Division 21 of the Public Resources Code to promote access to and enjoyment of the coastal resources of the state.

Although no matching funds have been identified for this project, a significant amount of other funding has been provided for the construction of this trail. The JPA recently secured \$349,670 from an Environmental Enhancement Mitigation Grant to Segment 9 of the trail. More than \$1.3 million in federal funding, combined with \$177,000 from the Coastal Conservancy was used to construct Segments 1-7.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project is consistent with Division 21, Chapter 9, of the Public Resources Code (Sections 31400-31409), regarding public access and enjoyment of coastal resources. Section 31400 states that the Conservancy shall have a principal role in the implementation of a system of public accessways to and along the state's coastline. Through the proposed action, the Conservancy would continue its role in supporting the development of two important public accessways to and along a major segment of the California coast. The proposed San Dieguito River Park Coast to Crest Trail will provide access to the coast from a heavily populated inland area and will be an important regional trail system. The Mesa Loop Trail will provide public access along the restored San Dieguito lagoon, an ecologically important feature of the coast in this area, and will constitute the only public access for views of the lagoon from the east and south side of the lagoon.

Section 31400.1 allows the Conservancy to award grants to a local agency for accessways that serve more than local public needs. The proposed San Dieguito River Park Coast to Crest Trail will serve residents of the numerous cities and communities along its 55 mile reach. The Mesa Loop Trail will serve residents of the surrounding cities of Del Mar, Solana Beach and San Diego. Both trails will also serve the many visitors to the San Diego area.

Consistent with § 31400.2, staff recommends approval of this project after evaluating the amount of funding provided by the Conservancy in light of the total amount available for coastal public accessway projects, the fiscal resources of the grantee, the urgency of the project relative to other eligible projects (see discussion below), and the application of factors prescribed by the Conservancy for the purpose of determining project eligibility and priority.

Section 31400.3 states that the Conservancy may assist public agencies in developing and implementing a system of public accessways to and along the state's coastline. The proposed project would further these goals by providing a major connecting public trail to a heavily-visited coastal area as part of a comprehensive public access plan.

Section 31408 charges the Conservancy, in consultation with the Department of Parks and Recreation, to develop the California Coastal Trail. Section 31409 provides authority to award grants and provide assistance to link the California Coastal Trail to inland trail systems. The Coast to Crest Trail constitutes a major inland trail system which, when completed, will connect to the segment of the California Coastal Trail planned for this area.

CONSISTENCY WITH CONSERVANCY'S 2007 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 1, Objective 1D** of the Conservancy's 2007 Strategic Plan, the proposed project would result in the construction of approximately 2.2 miles of trails (the Mesa Loop Trail and Segment 8 of the Coast to Crest Trail) within public ownership.

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Consistent with **Goal 1, Objective 1E** of the Strategic Plan, the proposed project would result in selection and design of the alignment of the 1.39-mile Reach the Beach segment of the San Dieguito River Coast to Crest Trail, a regional trail along a river, which will connect inland populations to the coast and expand recreational opportunities.

Consistent with **Goal 1, Objective 1F** of the Strategic Plan, the proposed project would result in the construction of approximately 2300 feet of the Coast to Crest Trail, a regional trail along a river, which will connect inland populations to the coast and expand recreational opportunities.

**CONSISTENCY WITH CONSERVANCY'S
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on June 4, 2009, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Support of the public:** The proposed project is supported by local organizations and elected officials, including State Senator Christine Kehoe and County Supervisor Pam Slater-Price. Project letters are included in Exhibit 6.
4. **Location:** The proposed project would be located within the coastal zone of the cities of Del Mar and San Diego.
5. **Need:** The JPA has constructed segments 1-7 of the lagoon trail portion of the Coast to Crest Trail with grants from the Federal Highway Administration and the Coastal Conservancy. The JPA has secured funding for the last segment, 9, through the Del Mar Horsepark. The JPA still needs funding to construct segment 8 to complete the lagoon trail and link up with the already constructed trail segment east of El Camino Real.
6. **Greater-than-local interest:** The Coast to Crest Trail is an important regional trail which when completed will link inland communities in San Diego with the coast at Del Mar. The Mesa Loop Trail will provide access along the lagoon and will serve residents of several surrounding cities as well as the many visitors to the San Diego area.
7. **Sea level rise vulnerability:** Both Segment 8 of the Coast to Crest Trail and the Mesa Loop Trail are proposed to be located at least 25 feet above mean sea level and are therefore less vulnerable to sea level rise due to their locations at higher elevation. The location of Segment 8 is outside of the area threatened by sea level rise within the next century based on current predictions. Under the worst case scenario of 4.6 feet of sea level rise by 2100, Segment 8 would be outside of the predicted highest high tides. However, the very western edge of the Mesa Loop Trail may be inundated during the highest high tides within approximately 30 years under the worst case scenario. Under the lower prediction of 1.7 feet of sea level rise

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by 2100, the trails would be completely outside of areas threatened by sea level rise. Inundation of a portion of the Mesa Loop Trail during the highest high tides would not pose a hazard to trail users because tidal flooding would be predictable and the trail could be closed when coastal flooding is anticipated. Because the rate of sea level rise is unknown and various predictions exist, it is not possible to know exactly how long the western edge of the trail would remain above the mean tide line. If sea level reaches a level at which the Mesa Loop Trail is routinely inundated by the tides, the western edge would no longer be usable and measures would need to be taken to realign the trail. Because sea level rise will likely happen incrementally, the JPA will be able to manage the access to and location of the trail so as to protect the safety of trail users.

Additional Criteria

- 13. Readiness:** The JPA has completed environmental documentation and secured permits for segment 8 of the lagoon trail and is ready to construct that segment.
- 14. Realization of prior Conservancy goals:** See “Project History” above.
- 16. Cooperation:** The 22nd DAA, which owns the Del Mar Horsepark, and the City of San Diego are working with the JPA on issues related to trail alignment and development of the Coast to Crest Trail and the Mesa Loop Trail.
- 17. Vulnerability from climate change impacts other than sea level rise:** It is unclear whether other climate change impacts such as higher air temperatures, altered precipitation patterns, more severe El Nino climate events, increased storm frequency and intensity, higher coastal erosion rates, greater fire intensity and frequency, etc. will adversely impact the Mesa Loop Trail and Lagoon Trail section of the Coast to Crest Trail. The JPA will pursue an adaptive management approach to maintaining the new trails up to and including moving sections of the trails if needed in response to the impacts of climate change.
- 18. Minimization of Greenhouse Gas Emissions:** The proposed Mesa Loop Trail and Lagoon Trail section of the Coast to Crest Trail will provide a trail opportunity within walking distance of a large surrounding residential population that can access the trails without having to drive. The trails will be accessible via existing public sidewalks and an existing connecting trail and, therefore, the trails will help reduce greenhouse gas emissions in the area by providing nearby residents a coastal recreational activity that is accessible by foot. Once completed, the Coast to Crest Trail will connect communities, provide access to the coast, and may help reduce vehicle miles traveled.

During construction, there will be a short-term, less than significant increase in greenhouse gas emissions. The greenhouse gas emissions from construction will be minimized to the extent possible. Most of the trail building will utilize hand equipment. No major excavation of materials will occur and all excavated materials will be used onsite thereby eliminating the need for dump trucks to haul away materials. A small tractor will be used for the initial grading and to smooth the trail alignment and a small number of trucks (a maximum of ten trips are estimated) will deliver decomposed granite and other materials for trail surfacing and fencing. The JPA will attempt to secure a local source of materials for construction of the trails.

CONSISTENCY WITH THE COASTAL CONSERVANCY'S STANDARDS AND RECOMMENDATIONS FOR ACCESSWAY LOCATION AND DEVELOPMENT:

The proposed project is consistent with the following standards established in the Conservancy's "Standards and Recommendations for Accessway Location and Development:"

Consistent with Standard No. 1, Segment 8 of the Coast to Crest Trail and the Mesa Loop Trail have been designed to minimize alteration of natural landforms and be subordinate to the natural setting and to protect environmentally sensitive habitat.

Consistent with Standard No. 5, the proposed project is consistent with the policies of Chapter Three of the Coastal Act, has been designed to avoid adverse impacts to sensitive wetland areas, and has been reviewed by the Department of Fish and Game and the California Coastal Commission.

Consistent with Standard No. 13, the proposed project will "accommodate or plan to accommodate those with mobility problems," and thus is of "the highest priority for state funding." The trails have been designed to comply with Americans with Disabilities Act (ADA) standards.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The proposed project is consistent with the Local Coastal Program policies of the City of Del Mar and the City of San Diego.

Construction of the proposed trail segments is consistent with the Land Use Plan of the City of San Diego's North City Local Coastal Plan, certified on March 31, 1981, which calls for:

"...maximum public access consistent with resource protection through the provision of alternative modes of public access such as public transportation and properly designed pedestrian and bicycle routes."

The proposed trails are located partly within the area governed by Torrey Pines Community Plan, which is incorporated into the North City LCP and contains the following policy concerning public accessways:

"Public access in areas of environmentally sensitive habitats shall be limited to low-intensity recreational, scientific, or educational use. Access shall be controlled or confined to designated trails or paths, and no access shall be approved which results in disruption of habitat."

As discussed in the "Project Description" section above, the proposed project is designed to be consistent with the approved wetland restoration project.

The Reach the Beach trail segment lies within the jurisdiction of the City of Del Mar. The City of Del Mar LCP Land Use Plan, certified on March 18, 1993, contains the following policies relating to public access which pertain to the proposed project.

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Policy IV-5 provides that continuous public access trail easements be granted as conditions of development within certain designated areas, including the shore of the San Dieguito River and Lagoon. Public access must be provided in a manner that minimizes disturbance to natural systems and minimizes impacts on wildlife and sensitive habitats. The alternatives analysis for the Reach the Beach segment will address siting issues related to impacts to sensitive resources and habitats.

Policy IV-18 recommends that the City cooperate with other local, state and federal agencies in developing a system of pedestrian trails and bicycle paths that would link together coastal recreation areas such as beaches and San Dieguito Lagoon.

COMPLIANCE WITH CEQA:

Pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA), the JPA and the USFWS as lead agencies, undertook environmental assessment of the entire San Dieguito Wetland Restoration Project, which encompassed the trail construction projects described in this staff recommendation as well as restoration of coastal wetland and upland areas surrounding San Dieguito Lagoon. The JPA and the USFWS prepared and adopted an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the restoration project. (Exhibit 7) On May 18, 2005, the Conservancy approved a grant for construction of segments 1-9 of the Coast to Crest Trail and found that there was no substantial evidence that construction of segments 1-9 of the Coast to Crest Trail, as mitigated, would have a significant effect on the environment. (Exhibit 5) Thus, the Conservancy has already made a finding that construction of segment 8, as mitigated, will not have a significant effect on the environment. The May 18, 2005 staff recommendation is incorporated by reference.

Impacts of constructing and operating the Mesa Loop Trail were also evaluated in the San Dieguito Wetland Restoration Project EIR/EIS. The EIR/EIS identified three potentially significant impacts that have been avoided through design and construction practices. The potential environmental impacts associated with constructing and operating the Mesa Loop Trail and the corresponding mitigation are as follows:

- Impact: The proposed trail system has the potential to be incompatible with surrounding land uses and recreation in the project area, and with the future restoration components of the project.
- Mitigation: Use of the Mesa Loop Trail will be limited to pedestrian use only between dawn and dusk. In this way, use of the trail will not adversely impact nearby existing residential development. In addition, the Mesa Loop Trail will be located away from sensitive habitats to avoid impacting restoration components of the project. Furthermore, the Mesa Loop Trail will eliminate informal access and trails which can adversely impact sensitive habitat and provide management practices such as signs, policing, trash collection, interpretive and directional signs which will further reduce the impacts of public use in the area on surrounding land uses.

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- Impact: The project has the potential to impact the California Least Tern and the existing least tern nesting island.
- Mitigation: No construction activities will occur within 500 feet of nesting birds between early April and mid-September when the least terns may be either foraging or breeding in the area. Public access is not expected to affect nesting terns because trails open to the public will not be located near the area where the new nesting areas will be created. In addition, no dogs will be allowed on the Mesa Loop Trail.

- Impact: The project has the potential to impact the western snowy plover.
- Mitigation: No construction activities will occur within 500 feet of nesting birds between mid-March and September which is breeding season for western snowy plovers. Public access is not expected to affect nesting plovers because trails open to the public will not be located near where the new nesting sites will be created. These new nest sites are not considered optimal habitat for snowy plover nesting. In addition, no dogs will be allowed on the Mesa Loop Trail.

The JPA prepared and adopted a Mitigation, Monitoring and Reporting Program (MMRP) to ensure that these measures are strictly enforced. Thus, the construction and operation of the Mesa Loop Trail, as mitigated, will not have a significant effect on the environment as defined in 14 California Code of Regulations Section 15382. Staff will file a Notice of Determination upon approval of the proposed authorization.

The JPA adopted a statement of overriding considerations when it approved the San Dieguito Wetlands Restoration Project because the project will have significant environmental effects that cannot be avoided. Although the proposed trail projects (Coast to Crest Trail and Mesa Loop Trail) are an element of the San Dieguito Wetlands Restoration project and were addressed in the EIR/EIS for the Restoration Project, the proposed trail projects will not have any unavoidable significant environmental effects. Therefore, no statement of overriding considerations is necessary in order for the Conservancy to fund the proposed trail projects.

The Reach the Beach Segment of the Coast to Crest Trail was not addressed in the EIR/EIS. The proposed project includes funding for preparation of CEQA documents for this segment of the trail. Engineering analysis, environmental review and design of the Reach the Beach segment alternatives are statutorily exempt from the requirement to prepare an EIR or negative declaration under 14 California Code of Regulations Section 15262 because they involve planning for possible future actions which the Conservancy has not approved, adopted, or funded. The proposed alternatives study will include an environmental review of the preferred alternative once it is identified. Staff will file a Notice of Exemption upon approval of the proposed authorization.